

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ROSEANN PAYNE,

**NOTICE OF
MOTION**

Plaintiff,

14 CV 7098 (ALC)

-against-

IMANI KIRKLAND,

Defendant.

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PLEASE TAKE NOTICE that upon the annexed Memorandum of Law dated March 17, 2017, and accompanying declarations of Brett H. Klein and Eric Hecker dated March 17, 2017, the undersigned shall move this Court before the Honorable Andrew L. Carter, Jr. United States District Judge, at the United States Courthouse for the Southern District of New York, for an order granting Plaintiff's Motion for Attorneys' Fees and Costs.

Dated: New York, New York
March 17, 2017

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BRETT H. KLEIN

To: Yan Fu, Esq.